

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re: BP p.l.c. SECURITIES LITIGATION

**Civil Action No. 4:10-md-2185**

In re: BP ERISA LITIGATION

**Civil Action No. 4:10-cv-4214**

**Honorable Keith P. Ellison**

**DECLARATION OF RONALD S. KRAVITZ**

Ronald S. Kravitz, an attorney admitted to practice before this Court, submits this Declaration in support of Plaintiffs' Reply in Support of Motion for Leave to File Amended Complaint, and pursuant to 28 U.S.C. § 1746 hereby declares:

I am a partner at Liner Grode Stein Yankelevitz Sunshine Regenstreif & Taylor LLP and one of the counsel for the ERISA Plaintiffs in the above-referenced cause.

Attached hereto are true and correct copies of the following documents:

Exhibit 1     Excerpts from deposition of Anthony Hayward **REDACTED**

Exhibit 2     Excerpts from deposition of Lamar McKay **REDACTED**

Exhibit 3     Excerpts from deposition of Lamar McKay **REDACTED**

Exhibit 4     Excerpts from deposition of James Dupree **REDACTED**

Exhibit 5     Excerpts from deposition of James Dupree **REDACTED**

Exhibit 6 Excerpts from deposition of Neil Shaw **REDACTED**

Exhibit 7 Ecowatch.org article entitled “BP Covered up Blow-out Two Years Prior to Deadly Deepwater Horizon Spill” dated April 19, 2012.

Exhibit 8 Affidavit by FBI Special Agent Barbara O’ Donnell.

Exhibit 9 Article from BBC News entitled “Tony Hayward was ‘Not Prepared’ for Gulf Oil Spill” dated November 8, 2010.

Exhibit 10 The Huffington Post article entitled “Ex-BP CEO Chooses Sea Protection Forum to Talk About Spill” dated May 4, 2012.

Exhibit 11 The News Star report entitled “State Treasurer Warns of Possible BP Bankruptcy” dated June 12, 2010.

Exhibit 12 TheStreet.com article entitled “Double Dip-Fear Winners: BP, AstraZeneca” dated June 29, 2010.

Exhibit 13 Excerpt from The New York Times blog “DealBook” entitled “Bank of America Said to Rein in Oil Trades with BP” dated June 15, 2012.

Exhibit 14 Forbes article entitled “British Stock Analyst Utters Unthinkable: Sell BP” dated June 15, 2010.

Exhibit 15 Market Watch report entitled “Hit to BP’s Market Cap Gushes Past \$100 Billion” dated June 25, 2010.

Exhibit 16 The CBS.com article entitled “Hayward: BP Unprepared for Media After Oil Spill” dated November 17, 2010.

Exhibit 17 BP Employee Savings Plan (ESP) and 2008 BP Investment Options Guide.

Exhibit 18 Document entitled “Your Guide to Net Benefits”.

Exhibit 19 Screencap of Metadata for “Your Guide to Net Benefits”  
[hr.bpglobal.com/LifeBenefits/Assets/Documents/n/NetBen\\_WebFNL.aspx](http://hr.bpglobal.com/LifeBenefits/Assets/Documents/n/NetBen_WebFNL.aspx).

Exhibit 20 Update #3 to the 2008 BP Investment Options Guide dated August 2009.

Dated: May 18, 2012

By: /s/ Ronald S. Kravitz  
RONALD S. KRAVITZ